

# EXHIBIT A

JAE LEE LAW, P.C.  
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Attorneys for Plaintiff, *Hermanjoh Llorca*

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HERMANJOH M. LLORCA,

*Plaintiff,*

vs.

FERNANDO HERNANDEZ, HUB TRUCK  
RENTAL CORP., RM BAKERY MANAGER  
LLC/DBA LEAVEN & CO., "JOHN DOES  
1-5", and "ABC COMPANIES 1-5", (all being  
fictitious designations),

*Defendants.*

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SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: BERGEN COUNTY

DOCKET NO.: BER-L-

CIVIL ACTION

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**COMPLAINT and JURY DEMAND**

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Plaintiff, Hermanjoh M. Llorca, residing at 223 Delia Place, in the Borough of Cliffside Park,  
in the County of Bergen, in the State of New Jersey, by way of Complaint against Defendants, says:

**FIRST COUNT**

1. On or about March 02, 2019, Plaintiff, Hermanjoh M. Llorca, was the operator of a  
motor vehicle owned by Hernane M. Llorca, which was traveling south on River Road, in the  
Borough of Edgewater, in the County of Bergen, in the State of New Jersey.

2. At the aforesaid time and place, Defendant, Fernando Hernandez, was the operator of a motor vehicle owned by Hub Truck Rental Corp., which was traveling south on River Road, in the Borough of Edgewater, in the County of Bergen, in the State of New Jersey.

3. At the aforesaid time and place, Defendants, “John Does 1-5”, (being fictitious designations), were the operators of a motor vehicle owned by Defendants, “ABC Companies 1-5”, (being fictitious designations), which were traveling south on River Road at or near the intersection with Burdette Court, in the Borough of Edgewater, in the County of Bergen, in the State of New Jersey.

4. At the aforesaid time and place, Defendants owned, operated, maintained, repaired and controlled their motor vehicles in such a negligent and careless manner so as to strike Plaintiff's vehicle.

5. As a result of the negligence and carelessness of Defendants, Plaintiff suffered severe and permanent injuries, was disabled and disfigured, has suffered and will continue to suffer great pain and torment, both mental and physical.

6. As a further result of Defendants' aforesaid negligence, and the injuries thereby caused to Plaintiff, Plaintiff has been, and will be in the future, compelled to spend great and diverse sums of money for medical aid and treatment, and has been, and will be, prevented from attending to his usual occupation, duties, activities and business.

**WHEREFORE**, Plaintiff, Hermanjoh M. Llorca, demands judgment against Defendants, Fernando Hernandez, Hub Truck Rental Corp., “John Does 1-5” and “ABC Companies 1-5” (all being fictitious designations), for damages, together with interest and costs of suit.

### **SECOND COUNT**

1. Plaintiff, Hermanjoh M. Llorca, repeats, reiterates and re-alleges the allegations of the previous Counts of this Complaint as if set forth herein at length.

2. Upon information and belief and at all times herein before mentioned, the Defendants, Fernando Hernandez, Hub Truck Rental Corp., Rm Bakery Manager Llc/dba Leaven & Co., John Does 1-5 (being fictitious persons whose identities are currently unknown) and ABC Companies 1-5 (being fictitious business entities whose identities are currently unknown) were individuals, corporations and/or companies doing business in the State of New Jersey.

3. At all times hereinafter mentioned, Defendants, Hub Truck Rental Corp., Rm Bakery Manager Llc/dba Leaven & Co., and ABC Companies 1-5 (being fictitious business entities whose identities are currently unknown) were corporations and/or companies doing business in the State of New Jersey, were the owners, lessors, lessees and/or renters of certain motor vehicles which were being operated with their permission by Defendants, Fernando Hernandez and John Does 1-5 (being fictitious persons whose identities are currently unknown), as their agent, servant, and/or employee.

4. On or about March 02, 2019 and at all times relevant hereto, Defendants, Fernando Hernandez and John Does 1-5 (being fictitious persons whose identities are currently unknown) were operating the said vehicles of the Defendants, Hub Truck Rental Corp., Rm Bakery Manager Llc/dba Leaven & Co., and ABC Companies 1-5 (being fictitious business entities whose identities are currently unknown) in the service of and in the course of their employment with the Defendant, Hub Truck Rental Corp., Rm Bakery Manager Llc/dba Leaven & Co., and ABC Companies 1-5 (being fictitious business entities whose identities are currently unknown) and thereby at all times herein mentioned, was acting as the agent, servant, and/or employee of the said Defendants, Hub Truck Rental Corp., Rm Bakery Manager Llc/dba Leaven & Co., and ABC Companies 1-5 (being fictitious business entities whose identities are currently unknown).

5. As a result of the negligence, carelessness and recklessness of Defendants, Fernando Hernandez and John Does 1-5 (being fictitious persons whose identities are currently unknown), in

the operation of the aforesaid vehicles while in the course of their employment and in the service of the Defendants, Hub Truck Rental Corp., Rm Bakery Manager Llc/dba Leaven & Co, and ABC Companies 1-5 (being fictitious business entities whose identities are currently unknown), severe and serious injuries and other damages were caused to the Plaintiff, Hermanjoh M. Llorca.

6. As a result of the acts of negligence, carelessness and recklessness of the Defendants, Fernando Hernandez and John Does 1-5 (being fictitious persons whose identities are currently unknown), as stated above, while in the course of their employment with and in the service of the Defendants, Hub Truck Rental Corp., Rm Bakery Manager Llc/dba Leaven & Co., and ABC Companies 1-5 (being fictitious business entities whose identities are currently unknown), said Defendants are liable to the Plaintiff for the negligent and reckless acts above stated of their agent, servant and/or employee, Defendant, Fernando Hernandez and John Does 1-5 (being fictitious persons whose identities are currently unknown), under the doctrine of Respondeat Superior and for all personal injuries and other damages herein sustained.

**WHEREFORE**, Plaintiff, Hermanjoh M. Llorca, hereby demands judgment against the Defendants, Fernando Hernandez, Hub Truck Rental Corp., Rm Bakery Manager Llc/dba Leaven & Co., John Does 1-5 and ABC Companies 1-5, jointly and severally, for damages, interest, attorney's fees and costs of suit.

#### **JURY DEMAND**

Plaintiff demands a trial by jury on all issues so triable.

#### **DESIGNATION of TRIAL COUNSEL**

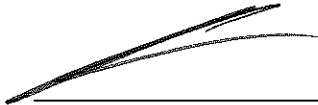
Pursuant of Rule 4:5-1(c), Martin S. Cedzidlo, Esq. is hereby designated as Trial Counsel.

**CERTIFICATION**

I hereby certify that this matter is not the subject of any other action pending in any court or arbitration proceeding, that no such other action or arbitration proceeding is contemplated by this Plaintiff, and that there are no other parties, whom, to the knowledge of Plaintiff(s)' counsel, should be joined in this action.

I hereby certify that Certifications Pursuant to the Automobile Cost Reduction Act of 1998 are attached hereto, made a part hereof and are being filed herewith as a part of Plaintiff's pleadings.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

  
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Jae E. Lee

Date: February 11, 2021

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Hermanjoh Llorca,

*Plaintiff,*

VS

Fernando Hernandez, et. al.

*Defendants.*

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION – BERGEN COUNTY

BER-L-

CIVIL ACTION

CERTIFICATION PURSUANT TO  
THE AUTOMOBILE INSURANCE  
COST REDUCTION ACT OF 1998

1. I am a licensed physician of the State of New Jersey and was a treating physician for automobile related injuries sustained by Hermanjoh Llorca, resulting from an accident which occurred on March 02, 2019.
2. Based upon my professional expertise, including reference to clinical objective findings and/or objective medical tests it is my opinion that within a reasonable degree of medical probability that Hermanjoh Llorca, has sustained permanent injuries that will have permanent residual sequelae.
3. It is my further opinion that within a reasonable degree of medical probability, that although further treatment in the future may alleviate some symptomatology, the permanent residuals of the injuries cannot be completely resolved by way of further medical treatment intervention and there will always be some aspect of residual permanent injuries experienced for the balance of my patient's lifetime.
4. I affirm that the above conclusions are true to the best of my knowledge and belief, and I am subject to punishment as outlined in the Automobile Insurance Cost Reduction Act if any statements are made with fraudulent intent to misrepresent the residual aspects of my patient's injury.

Fred Lee, M.D.

Dated: 2/9/2021

## Civil Case Information Statement

### Case Details: BERGEN | Civil Part Docket# L-000971-21

**Case Caption:** LLORCA HERMANJOH VS HERNANDEZ FERNANDO

**Case Initiation Date:** 02/11/2021

**Attorney Name:** JAE E LEE

**Firm Name:** JAE LEE LAW PC

**Address:** 2050 CENTER AVE STE 120

FORT LEE NJ 07024

**Phone:** 2013463800

**Name of Party:** PLAINTIFF : LLORCA, HERMANJOH, M

**Name of Defendant's Primary Insurance Company**  
(if known): CHUBB INSURANCE

**Case Type:** AUTO NEGLIGENCE-PERSONAL INJURY (NON-VERBAL THRESHOLD)

**Document Type:** Complaint with Jury Demand

**Jury Demand:** YES - 6 JURORS

**Is this a professional malpractice case?** NO

**Related cases pending:** NO

**If yes, list docket numbers:**

**Do you anticipate adding any parties (arising out of same transaction or occurrence)?** NO

**Are sexual abuse claims alleged by:** HERMANJOH M LLORCA? NO

### THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

**Do parties have a current, past, or recurrent relationship?** NO

**If yes, is that relationship:**

**Does the statute governing this case provide for payment of fees by the losing party?** NO

**Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:**

**Do you or your client need any disability accommodations?** NO

**If yes, please identify the requested accommodation:**

**Will an interpreter be needed?** NO

**If yes, for what language:**

**Please check off each applicable category:** Putative Class Action? NO Title 59? NO Consumer Fraud? NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*

02/11/2021

Dated

/s/ JAE E LEE

Signed